

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

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In re:	:	Chapter 11
	:	
TELEGLOBE COMMUNICATIONS	:	Jointly Administered
CORPORATION, et al.,	:	Bankruptcy Case No.
	:	No. 02-11518 (MFW)
Debtors	:	
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TELEGLOBE COMMUNICATIONS	:	CIVIL ACTION
CORPORATION, et al.,	:	
	:	
Plaintiffs	:	
	:	
vs.	:	
	:	
BCE INC., MICHAEL T. BOYCHUK,	:	
MARC A. BOUCHARD, SERGE FORTIN,	:	
TERENCE J. JARMAN, STEWART VERGE,	:	
JEAN C. MONTY, RICHARD J. CURRIE,	:	
THOMAS KIERANS, STEPHEN P.	:	
SKINNER and H. ARNDOLD	:	
STEINBERG,	:	
	:	
Defendants	:	NO. 04-1266 (SLR)

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Wilmington, Delaware
Thursday, March 31, 2005
4:32 o'clock, p.m.

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BEFORE: HONORABLE SUE L. ROBINSON, Chief Judge

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Valerie J. Gunning
Official Court Reporter

1 to it within the next week or two. All right?

2 MR. SHANDLER: Thank you, your Honor.

3 THE COURT: All right.

4 MR. WADE: If I might just say a word on that
5 issue...

6 THE COURT: Yes?

7 MR. WADE: There were three privilege issues
8 faced by BCE that were really quite different. One was,
9 it is certainly true that members of the Legal Department
10 at BCE worked -- did some work for Teleglobe when Teleglobe
11 was a wholly-owned subsidiary. Not unusual. Those
12 documents were all turned over to Teleglobe at the very
13 outset. They're simply not at issue.

14 The second was there were some places where
15 BCE attorneys worked with what they conceived of as the
16 common interest of Teleglobe and BCE. And there were
17 areas of common interest. That was argued before Judge
18 Walrath. Judge Walrath said, Well, if it's the common
19 interest of Teleglobe, produce them, because Teleglobe
20 does have an interest in those. We did.

21 The ones we are concerned about are those in
22 which the attorneys were clearly working for BCE and
23 knew they were working for BCE and no one else.

24 THE COURT: I just smile at the word clearly,
25 because there's very little that's truly clear in this life.